Rhodia

Health, Safety and Environmental Services

June 8, 1998

Dr. C.W. Jameson
National Toxicology Program
Report on Carcinogens, MD WC-05
P.O. Box 12233
Research Triangle Park, NC 27709

RE: Response to the Call for Public Comments on the recommendation to list "Strong Inorganic Acid Mists Containing Sulfuric Acid" for Inclusion in the Report of Carcinogens, Ninth Edition.
63 Fed. Reg. 13418-20 (March 19, 1998)

Dear Dr. Jameson:

I realize it is past the due date for comments but felt it was important to bring to your attention a recent publication. I am enclosing a June 1998 article by Gustavvson et al. It is a report of a case-control study from Sweden. Among the occupational exposures reviewed is acid mists. Cancers of the upper aerodigestive system (including cancer of the larynx) were studied.

While this study does not shed new light on the hypothesized relationship between cancer of the larynx and occupational exposure to acid mists (the number of cases and controls that were exposed is very small), it does provide additional evidence that one of the key studies relied upon by the IARC and NTP is severely flawed. The reference to the flawed study is: Soskolne, C. L., Jhangri, G.S., Siemiatycki, J., et al. Occupational Exposure to Sulfuric Acid in Southern Ontario, Canada, in Association with Laryngeal Cancer. *Scand J Work Environ Health*, 1992; 18:225-232. Please refer to comments submitted by the Chemical Manufacturers Association (CMA) for more details on the problems identified with this study. In that study Soskolne, et al. report that over 50% of both cases and controls have possible exposure to acid mists. This estimate was based on guess work by one of the study authors. The CMA has asserted that these estimates are so grossly high that the study is completely unreliable. The enclosed paper from June 1998 used actual interviews to determine possible occupational exposures and the percent of all cases exposed to acid mist was 2.2% (12/545, see tables 1 and 2). The percent of controls exposed was reported in the text of the paper as 2.0%. I believe these estimates of exposure are far more accurate than those of Soskolne, et al. It should be obvious that the Soskolne paper should be given no credibility because of the gross errors in exposure estimation.

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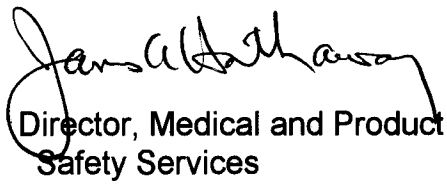
This new paper provides further evidence beyond that previously submitted by the CMA that key studies relied on by the IARC and NTP are flawed. In my view the weight of the scientific evidence does not support a conclusion that occupational exposure to strong inorganic acid mists cause cancer in humans. I hope that the NTP will give consideration to this submission and new information.

Sincerely,



Director, Medical and Product Safety Services